

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION

Kevin Turner and Shawn Wooden,  
*on behalf of themselves and  
others similarly situated,*

Plaintiffs,

v.

National Football League and  
NFL Properties LLC,  
successor-in-interest to  
NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

No. 2:12-md-02323-AB

MDL No. 2323

**Hon. Anita B. Brody**

Civ. Action No. 14-00029-AB

**CO-LEAD CLASS COUNSEL'S**  
**MOTION FOR AN INJUNCTION PROHIBITING IMPROPER COMMUNICATIONS**  
**WITH THE CLASS BY CLASS MEMBER, FRED WILLIS,**  
**THROUGH HIS ORGANIZATIONS,**  
**NFL PLAYERS BRAINS MATTER™, HPN NEUROLOGIC®, AND**  
**HPN CONCUSSION MANAGEMENT®, OR OTHERWISE**

Co-Lead Class Counsel submit this Motion seeking an Injunction Prohibiting Improper Communications with the Class by Class Member Fred Willis, through his Organizations, NFL Players Brains Matter™, HPN Neurologic®, and HPN Concussion Management®, or Otherwise. Pursuant to Fed. R. Civ. P. 23(d) and the All Writs Act, 28 U.S.C. § 1651, and for the reasons stated in the accompanying Memorandum of Law and Declaration, the Motion should be granted

and Mr. Willis should be ordered to cease and desist in the dissemination of misinformation and falsehoods about the Settlement and to remove all misinformation and falsehoods from his organizations' websites.

In addition to an injunction, Co-Lead Class Counsel also seek other relief, should the Court find such other relief appropriate. Specifically, if the Court determines that the misinformation and falsehoods disseminated by Mr. Willis were such that curative notice is appropriate, the undersigned request that this Court order Mr. Willis (and/or those with whom he is working) to pay the costs of printing and disseminating the curative notice. Additionally, the undersigned request the Court's authorization for Co-Lead Class Counsel to conduct discovery of Mr. Willis, including interrogatories and a deposition, in order to determine (1) whether Mr. Willis is working with any lawyers and/or litigation funders, and, if so, their identities and the nature of their involvement; and (2) whether any Retired Players have signed up with or contacted Mr. Willis' organizations and if so, their identities, and the terms of the arrangements with them, if any. If the Court is inclined to allow the discovery, we further request that the Court order Mr. Willis to cooperate fully.

Dated: February 21, 2017

Respectfully submitted,

/s/ Christopher A. Seeger  
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**Co-Lead Class Counsel**

**CERTIFICATE OF SERVICE**

It is hereby certified that a true and correct copy of the foregoing motion, along with the accompanying memorandum of law, proposed order and declaration with exhibits, was served electronically via the Court's electronic filing system on the date below upon all counsel of record in this matter. True and correct copies of the foregoing motion and supporting documents were served via certified mail, return receipt requested, and via Federal Express, overnight delivery, upon Fred Willis, who is not on the ECF service list for this MDL. Mr. Willis is being served at the address listed for his organizations, namely, 8 Ferry Lane, Marblehead, MA 01945.

Dated: February 21, 2017

/s/ Christopher A. Seeger  
Christopher A. Seeger